

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

SANDRA HARRIS,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-12-470-D
)	
AMERICAN INTERNATIONAL)	
GROUP, INC., d/b/a AMERICAN)	
INTERNATIONAL COMPANIES,)	
AND GRANITE STATE INSURANCE)	
COMPANY,)	
)	
Defendants.)	

**DEFENDANT AMERICAN INTERNATIONAL GROUP, INC.’S
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSIVE PLEADING**

COMES NOW, Defendant American International Group, Inc. (“AIG, Inc.”), and pursuant to LCvR7.1, requests an extension of time in which to file a responsive pleading to Plaintiff’s Complaint [Document1], filed on April 27, 2012. In support of this request, AIG, Inc. states as follows:

1. AIG, Inc. was served with Plaintiff’s Complaint on July 30, 2012.
2. AIG, Inc.’s responsive pleading to Plaintiff’s Complaint is currently due on August 20, 2012.
3. No previous motions for extensions have been made.
4. AIG, Inc. is filing a Special Entry of Appearance contemporaneously herewith and requests a twenty (20) day extension of time in which to file a responsive

pleading to Plaintiff's Complaint so that it has sufficient time to respond to Plaintiff's allegations and identify possible defenses.

5. Plaintiff has no objection to a twenty (20) day extension.

6. A twenty (20) day extension will not have any impact on this case, as no scheduling order has been entered.

7. AIG, Inc. expressly states that it does not waive its right to file a motion to dismiss in response to Plaintiff's Complaint and that it does not waive any of its defenses by filing this Motion for Extension of Time to File a Responsive Pleading, including, but not limited to, the defense of lack of subject-matter jurisdiction, lack of personal jurisdiction, improper venue, insufficient process, insufficient service of process, failure to state a claim upon which relief can be granted, and/or failure to join a party.

WHEREFORE, AIG, Inc. respectfully requests a twenty (20) day extension to file a responsive pleading to Plaintiff's Complaint, giving AIG, Inc. until Monday, September 10, 2012, to file an answer or motion to dismiss in response to Plaintiff's Complaint.

Submitted by:

s/William D. Perrine

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Counsel for Defendants,

American International Group, Inc. and

Granite State Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of August 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Steven S. Mansell, OBA No. 10584

Mark A. Engel, OBA No. 10796

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s/William D. Perrine

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